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February 7, 2022

U.S. Department of Transportation, Docket Operations
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Summary Grant Petition for an Exemption to Conduct Unmanned Aircraft Systems (UAS) Operations Allowed by Special authority for certain unmanned aircraft systems. Title 49 U.S.C. § 44807, and 14 C.F.R. Part 11 to Authorize Commercial Agricultural-Related Services with UAS Weighing 55 Pounds or More for the HSE-UAV M6A Pro G200

The following contains a summary of the attached completed Petition for Exemption seeking relief from specified requirements of Federal Aviation Regulations for our client EnviroScience, Inc.

Description of Relief Sought: On behalf of our client, EnviroScience, Inc, an agricultural services company (hereafter known as EnviroScience), and pursuant to Title 49 U.S.C. § 44807, Special authority for certain unmanned aircraft systems and 14 C.F.R. Part 11, EnviroScience hereby respectfully requests expedited approval and necessary exemptions from the following listed Code of Federal Regulations ("CFR") for the purpose of operating the HSE-UAV M6A PRO G200 unmanned aircraft systems ("UAS") weighing over 55 pounds but no more than 88.3 pounds, for various agricultural operations and noxious weed and vegetation control throughout the United States. The operations will be conducted within and under the conditions outlined herein, or as may be established by the FAA, as required by Title 49 U.S.C. § 44807. The proposed operation in this Petition for Exemption is similar in nature to those currently conducted by DroneXum, LLC. Exemption No. 18413A, except that the aircraft is the HSE-UAV M6A Pro G200 which has additional safety features and benefits and is therefore considered a summary grant.

The primary contact for this petition, with a copy to me at the address above is:
Jeff Niehaus

5070 Stow Road
Stow, OH 44224

SYSTEM BENEFITS AND PUBLIC INTEREST

1. EnviroScience intent along with a complete range of agricultural vegetation and noxious weed control and management services, utilizing the M6A Pro G200 system optimized principally for spray applications. Their processes protect crops from biological organisms, including weeds, pathogens, and arthropods, that interferes with the production of crops affecting quality and/or yield, which can impact consumers through higher crop prices. Spraying herbicides benefits agricultural ecology and increases the efficiency of harvesting operations. Further the selective use of chemicals for a safer more targeted application for utility weed control reduces the negative impact of excess pesticide application and residual chemicals being left in the soil or running off into streams or the water table.

2. Applications by manned helicopters for agriculture carries significant risks of fatality. This was such a concern that in 2014 the National Transportation and Safety Board commissioned a report to understand root causes. The enhanced safety achieved using an unmanned aircraft with the specifications described in this petition, as opposed to the much larger, manned aircraft carrying fuel and crew or passengers, is safer and exposes workers and other people on the ground to significantly less risk. Additionally, EnviroScience UA use batteries which are not as flammable and explosive as 100LL or Jet A fuel. If there was an emergency where the UA crashed, there is a significantly lower chance of individuals being injured from an explosion or fire.

3. According to a USDA Economic Research Service Report, of the United States' 408 million acres of cropland, about 70% (286 million acres) is commercially treated with crop protection products. Out of that, the agricultural aviation industry treats 71 million acres of cropland aerially each year. By utilizing UAS, this vital portion of our nation's food supply can be treated in a more environmentally safe way, thus protecting our streams from excessive chemical run off, algae blooms, etc.

4. A large portion of the agricultural land is currently sprayed by crews on foot, carrying heavy loads on steep, dangerous terrain. EnviroScience will replace this method using its aircraft. It is in the interest of safety to reduce worker exposure to this difficult and dangerous environment.

5. Manned aircraft availability and scheduling are becoming increasingly difficult and costly for EnviroScience customers. On average, each manned aerial application business has 2.1 aircraft, ranging in price from $100,000 to $1,400,000 depending on hopper size, engine type and engine size. Pilot shortages, aircraft shortages, and driver shortages are increasing. Smaller owners and non-governmental organizations without several hundred thousand acres are finding it difficult to obtain economical services with these figures. EnviroScience can increase service providers at a lower cost and alleviate pilot and service shortages for small landowners.

6. Manned airplanes and helicopters produce significant noise pollution that disrupt the public's ability to enjoy both private and public property. UAS are much quieter and will not disrupt the public as much as manned aircraft; thus, the benefit will be recognized as a reduction in noise pollution.

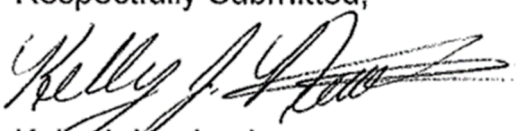
7. Pesticides being sprayed from high elevations can be picked up by the wind and carried for

miles. By flying at a lower altitude (6-12 m), and by never leaving the customer's site, there is a significantly reduced chance of pesticides ("driftable fines") being accidentally sprayed in the wrong area. With manned aircraft and helicopters, this can happen in a number of ways: Pilot error or map misinterpretation en route to the site, pesticides being picked up by the wind and blown onto neighboring property affecting commercial cropland and residential areas, and equipment malfunction.

Specific Code of Federal Regulation ("CFR") sections from which an exemption is sought: §§ 61.3 (a)(1)(i), 91.7(a), 91.119(c), 91.121, 91.151(b), 91.403(b), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), 91.417(a) and (b), 137.19 (c), (d) and (e)(2)(ii)(iii) and (v), 137.31, 137.33, 137.41(c), 137.42.

Should you have any questions, or if you need additional information to support EnviroScience Petition, please do not hesitate to contact the undersigned.

Respectfully Submitted,



Kelly J. Neubecker

President, UASolutions Group